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Attorney for Defendant
SANDRA LE

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

SANDRA LE,

Defendant.

Case No. CR 21-00331 WHO

**STIPULATION TO VACATE AND
RESET STATUS HEARING AND
EXCLUDE TIME FROM FEBRUARY 3,
2022 TO MARCH 31, 2022; [PROPOSED]
ORDER**

It is stipulated by and between counsel for the United States and counsel for the defendant, Sandra Le, that the status conference scheduled for February 3, 2022 at 1:30 before the Hon. William H. Orrick be vacated and rescheduled for March 31, 2022 at 1:30 PM.

Based on ongoing discussions with the Government, defense counsel anticipates receiving additional discovery. The anticipated discovery is expected to be voluminous. Additional time is needed to evaluate, process, discuss with Ms. Le, and conduct any defense investigation, if necessary, before proceeding.

Based on the foregoing, the parties stipulate and agree that excluding time from February 3, 2022 until March 31, 2022 will allow for the effective preparation of counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(iv). The parties further stipulate and agree that the ends of justice served by excluding the time from February 3, 2022 until March 31, 2022 from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. 18

U.S.C. § 3161(h)(7)(A), (B)(iv).

Undersigned defense counsel certifies that she obtained approval from the Assistant United States Attorney to file this stipulation and proposed order.

IT IS SO STIPULATED

DATED: February 1, 2022

By: _____ /s/
Ashley Riser
Counsel for SANDRA LE

DATED: February 1, 2022

UNITED STATES ATTORNEY'S OFFICE

By: /s/
KENNETH CHAMBERS
Attorneys for Plaintiff
UNITED STATES OF AMERICA

[PROPOSED] ORDER

Based upon the facts set forth in the stipulation of the parties and for good cause shown, the Court vacates the status conference scheduled for February 3, 2022 at 1:30 P.M. and reschedules it for March 31, 2022 at 1:30 PM. The Court further finds that failing to exclude the time from February 3, 2022 until March 31, 2022 would unreasonably deny defense counsel and the defendant the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by excluding the time from February 3, 2022 until March 31, 2022 from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial.

Therefore, and with the consent of the parties, IT IS HEREBY ORDERED that the time from February 3, 2022 until March 31, 2022 shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

DATED: _____

HON. WILLIAM H. ORRICK
United States District